

REPORT OF THE PRETREATMENT AUDIT

AT
City of Lebanon, Missouri

P.O. Box 111
Lebanon, MO 65536

NPDES Permit No.: **MO-0089010**

BY
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION VII
ENVIRONMENTAL SCIENCES AND TECHNOLOGY DIVISION (ENST)
ENVIRONMENTAL FIELD COMPLIANCE BRANCH (EFCB)

ON
DECEMBER 12-14, 2016

On December 12, 13, and 14, 2016, a Pretreatment Audit was conducted at the City of Lebanon, Missouri Approved Pretreatment Program. To direct the Audit, a checklist was used that evaluates all important elements of the Pretreatment Program. A copy of the checklist is attached to this report (Attachment 1). The Audit consisted of a discussion and file review with the City's program staff and an evaluation of the City's Biosolids Management Program (Sludge). This narrative report presents the findings of the audit. All other documentation not included as an attachment to this report has been submitted directly to the EPA files. Sieu Dang and Todd Blanc with the Missouri Department of Natural Resources (MDNR), were present during the Pretreatment the Audit.

PARTICIPANTS

City of Lebanon:

- Craig Perry, Wastewater Treatment Facility Chief Operator/ Pretreatment Coordinator.
- Richard Shockley, Public Works Director.
- Eric Mork, Environmental Superintendent.

MDNR – St. Louis Regional Office:

- Sieu T. Dang, Environmental Engineer.
- Todd Blanc, Environmental Scientist.

U.S. Environmental Protection Agency (EPA), Region VII:

- Naji J. Ahmad, Environmental Engineer, ENST/EFCB.

INTRODUCTION

The City of Lebanon, with an approximate population of 14,474 people (2010 census), currently owns and operates an activated sludge Wastewater Treatment Plant (WWTP) under the National Pollutant Discharge Elimination System (NPDES) permit number MO-0089010 that will expire on January 03, 2017. The WWTP receives discharges from four Significant Industrial Users (SIUs). According to the NPDES permit, the treatment plant is designed to treat an average dry weather flow of 2.6 million gallons per day (MGD) and an average wet weather flow of 3.8 MGD.

The NPDES permit included a provision to implement the approved Pretreatment Program and submit on or before March 31 of each year a report briefly describing its Pretreatment Program.

The U.S. Environmental Protection Agency- Region 7 (EPA) conducted a pretreatment audit in June of 2007 and found several issues with the City's implementation of its Pretreatment Program. Based on my findings during this audit, those issues continue to exist and the City continues to fail to adequately implement its Pretreatment Program.

LEGAL AUTHORITY

The Missouri Department of Natural Resources (MDNR) originally approved the City's Pretreatment Program on December 19, 1984, and approved the City's Sewer Use Ordinance (SUO) on September 17, 1992. Chapters 26 of the SUO gives the City the authority to implement and enforce the Pretreatment Program, such as issuing permits for a duration of five (5) years or less and the right to inspect, sample, enforce, and collect fines up to five hundred dollars (\$500).

The City has yet to incorporate the EPA 2005 Amendments to the General Pretreatment Regulations [40 CFR 403.8, 40 CFR 403.13] known as the Streamlining Rule which the State of Missouri had adopted by reference on October 30, 2012. In addition, the City has yet to evaluate its SUO against the Streamlining Rule. The MDNR sent letters to Cities with approved programs to evaluate their SUO and see if the changes are necessary.

LOCAL LIMITS

The current Local Limits were adopted by the City in 1984 (Table 1) under Section 26-161(c). The EPA 2007 audit report indicated that in 1996 the City of Lebanon, with the approval of MDNR, developed technically based numerical local limits. However, those limits were not adopted by the City.

Table-1 Local Limits (adopted in 1984)

Pollutant	Local Limit	Pollutant	Local Limit
Arsenic	0.5 mg/l	Nickel	5.0 mg/l
Cadmium	5.0 mg/l	Silver	2.0 mg/l
Copper	5.0 mg/l	Total chromium	5.0 mg/l

Cyanide	0.5 mg/l	Zinc	2.0 mg/l
Lead	5.0 mg/l	Mercury	0.5 mg/l
Oil, fats or grease	15.0 mg/l	Total identifiable Chlorinated hydrocarbons	40.0 g/l
Phenolic compounds “cannot be removed by the WWTP”			7.5 mg/l

INDUSTRIAL WASTE SURVEY (IWS)

The last formal Industrial Waste Survey (IWS) was conducted in 1992. During the EPA pretreatment audit of the City’s approved program in June 2007, it was noted that in February 2006, the City used the first page of the industrial inspection checklist to informally conduct an IWS. It was concluded that the City needs to conduct a formal survey. The City failed to abide by the EPA conclusion.

SIGNIFICANT INDUSTRIAL USERS

Currently, the City regulates four industries, all of which are subject to the Metal Finishing Categorical Standards (433), which is a concentration based standard. In addition to the Metal Finishing Standard, RBC (formally Marathon Electric) is also subject to the Metal Molding and Casting Standard (464), which is a production based standard.

Table-2 Significant Industrial Users

Significant Industrial Users	Categorical Standard(s)
Copeland	433
Detroit Tools & Engineering	433
Detroit Metal Products	433
RBC	464 & 433

Based on my interview with City personnel and based on my industrial files review, it is not clear what the volumes of industrial flows are being discharged to the City’s collection system from the four industries. It was also pointed out to City personnel that due to the lack of documentation and information within the industrial files, it was not clear what type of industrial activities were within each industry.

PERMITS

The City issues all permits with a five-year duration. All permits are current and are due to expire on February 28, 2018. All permits have the same format, same limits, and same requirements.

Section 26-163(b)(5), of the SUO and the permit both require the permittee to apply for permit reissuance a minimum of one hundred eighty (180) days prior to the expiration of the user's existing permit. My review of industrial permits indicated that the permits are poorly written. I pointed out to City personnel the following observations:

Copeland:

1. The industry submitted its permit renewal application on June 22, 2012, and the permit was issued on February 28, 2013.
2. The industry submitted a letter stating that they installed a new process and a new outfall. But the City did not modify the permit and the permit continues to identify one outfall.

Detroit Tools & Engineering:

1. The industry submitted a late permit renewal application on November 30, 2012. The permit was issued on February 28, 2013.

Detroit Metal Products:

1. The last permit renewal application was submitted on February 21, 2003. The permit was issued on February 28, 2013.

RBC:

1. The industry failed to submit a permit renewal application; however, the City issued the permit on February 28, 2013.
2. As mentioned above, the industry, in addition to the Metal Finishing Standard, it is also subject to the Metal Molding and Casting Standard (464) which is a production based standard. Each categorical process discharges from a separate outfall and the permit identifies the two outfalls. However, the Permit includes limits for the Metal Finishing Standards (40 CFR 433), but it does not include or mention the production based limits of the Metal Molding and Casting Standard (464) which applies to one of the process at the facility.

All permits

1. None of the permits were signed by the City.
2. Require a composite sample for cyanide. Cyanide should be a grab sample according to 40 CFR Part 136. This observation was mentioned during the MDNR Pretreatment inspection on April 25, 2013.
3. Indicate that all samples to be collected and analyzed by the City three times per year but do not include language to the effect that in case the City is unable to collect the sample then it's the responsibility of the industry to do so.
4. Do not include confidentiality provisions, require resampling within 30 days, specify limited transferability, specify right of entry, or right to inspect.
5. Permits do not require immediate slug load notification, rather they require notification within 24 hours.

INSPECTIONS

The City inspected all industries during the past twelve months. Inspections were performed by the Pretreatment Coordinator, using a one-page checklist that does not include the minimum information of the EPA model checklist. During my review of inspection records, I noticed that up until 2012, the City used to complete a six - page check list. When I asked Mr. Perry why he started completing only the first page of the checklist rather than the entire six pages, he replied

that the information included in the other five pages remains almost the same and that he did not see the need to complete them every year. I informed him that this is a wrong assumption based on the documented recent changes to industrial processes within some of the industries such as the slug discharge from Detroit Metal Products in November 2013 and the facility adding a new process in 2013, Copeland not sampling for nickel and not submitting the Toxic Organic Management Plan (TOMP), Detroit Tools & Engineering not being sampled in the past two years, and RBC's failure to submit semiannual compliance report.

SAMPLING AND REPORTING

As required by the permit, the City samples all industries three times per year for all regulated pollutants by following the EPA's sampling procedures. City personnel collect the metal samples and send them to a contract lab in Springfield for analysis. The City laboratory is capable of analyzing conventional pollutants using procedures conforming to 40 CFR Part 136.

As mentioned above, the permit indicates that a composite sample is required for cyanide. However, Mr. Perry indicated that he collects a grab sample. Some of the chain of custody sheets do indicate that the City collected a grab sample for cyanide.

Sampling results are forwarded to the industries and each industry is required to submit semiannual reports to the City. During my review of industrial files, I noted to Mr. Perry that I was not able to locate the semiannual report that included the Certification Statement as required by the general Pretreatment regulations. In fact, the last reports submitted by the industries were in 2013 and they were annual not semiannual.

I also pointed out to Mr. Perry that those reports were missing the Total Toxic Organics (TTO) Certification statement since all industries are allowed to develop and implement the Solvent Management Plan/Toxic Organic Management Plan (TOMP) in lieu of monitoring for TTOs. The TTO certification that is required by 433.12(a) or 413.03(a), as applicable, is to be submitted with each semiannual report and must state: *"In lieu of requiring monitoring for TTO, the permitting authority (or, in the case of indirect dischargers, the control authority) may allow dischargers to make the following certification statement: "Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation [or pretreatment standard] for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the permitting [or control] authority".*

During my review of industrial files, I pointed out to Mr. Perry that I was only able to locate a TOMP document for the Detroit Tool Metals and it was not signed nor dated. I also pointed out to him that Copeland submitted a Spell Prevention and Countermeasure Control (SPCC) Plan rather than a TOMP.

I explained to Mr. Perry that the TOMP plan and the Certification Statement are required of an

industry when the industry (in this case is the City, since they collect the samples) chooses not to sample for TTOs. This is true in the case of these industries since the City does not sample for TTOs.

In addition, I noted to Mr. Perry that each industry that failed to submit the semiannual Certification Statement, or failed to develop the TOMP, or failed to sample for TTOs would be in Significant Non Compliance (SNC).

I asked City personnel how they took pH measurements. Mr. Perry stated that they analyzed the samples on site within the 15-minute time frame.

The City sampled all of its industries in 2015 and 2016 except Detroit Tools & Engineering. Mr. Perry indicated that for the past two years every time he tries to collect samples at the industry, the industry personnel inform him that there is no discharge on that day. I informed Mr. Perry that the industry should be held responsible for not collecting the samples and that he should be able to go back when the facility is discharging. He also mentioned to him that the industry is a batch discharge and they do discharge frequently.

Records indicate the City did not sample for nickel at Detroit Tools & Engineering in August 2016, February 2016 and May 2015; at Copeland in March, 2016 and December 2015; and at RBC in February 2016.

During my review of monitoring records, I pointed out to City personnel the following observations:

Copeland:

1. The industry submitted an SPCC not a TOMP.
2. The industry failed to submit semiannual reports.
3. The industry did not sample for TTOs.
4. The industry failed to sample for nickel.

Detroit Tools & Engineering:

1. The industry submitted a TOMP. The plan was not signed and was not dated.
2. The industry failed to submit semiannual reports.
3. The industry failed to collect samples in 2015 and 2016.

Detroit Metal Products:

1. The industry submitted an SPCC not a TOMP.
2. The industry failed to submit semiannual reports.
3. The industry did not sample for TTOs.
4. The industry failed to sample for nickel.

RBC:

1. The industry failed to submit a TOMP.
2. The industry failed to submit semiannual reports.

3. The industry did not sample for TTOs.
4. The industry failed to sample for nickel.
5. Samples are collected at both outfalls and results are examined against the Metal Finishing Standards 40 CFR 433.

WASTE HAULER

According to Mr. Perry, the City accepts approximately five loads per week averaging 1,000 gallons per load from septic waste haulers. The City has no mechanism to monitor or control the waste when it is received at the WWTP.

ENFORCEMENT

The City's Enforcement Response Plan (ERP) was developed in 1992. However, during the 2007 audit and this audit, the City did not have a copy of the ERP on file. Section 26-164, *Enforcements*, of the SUO, list the proper elements in an approved program. The SUO includes some enforcement guidelines but not enough to compose an ERP. Moreover, the SUO indicates that the maximum fines are not to exceed five hundred dollars (\$500) per day.

Mr. Perry was not familiar with the ERP because he has never seen it. Mr. Perry mentioned that the City of Lebanon has not had any violations or non-compliance issues in the past 12 months and that all industries are in compliance in the past two years. I pointed to Mr. Perry that based on my file review, all industries are in SNC because some failed to sample for nickel and some failed to submit semiannual reports.

Records indicate that Detroit Metal Products had a slug discharge to the City on November 17, 2013. City files did not have documentation one what effect the slug discharge had on the plant operation of what and the City failed to take any enforcement action. In fact, there was no indication that the City took any enforcement action against any of its industries for any violation.

SLUDGE QUALITY

One function of the Pretreatment Program is to protect the City's sludge from metals contamination. As part of this audit, the 2015 sludge monitoring report was briefly reviewed to determine the Pretreatment Program's effectiveness.

In 2015, the WWTP generated approximately 500.68 dry tons of sludge with 2.5 percent solids. Below is the table that compares the City's peak observed metals levels against the statutory ceiling and the City's average level against the exceptional quality (EQ) sludge level specified by the 40 C.F.R. Part 503 Sludge regulations.

Because the City sampled its sludge quarterly in 2015, the monthly average is also the maximum value observed.

Table 3, Lebanon's 2015 Digester's Sludge Quality (mg/kg)

Pollutant	503	503	Max	Mo. Avg.	Max/Ceiling	Avg./EQ
	Ceiling	EQ				
Arsenic, As	75	41	33	33	44.00%	80.49%
Chromium Cr	3000	1200	30	30	1.00%	2.50%
Cadmium, Cd	85	39	16	16	18.82%	41.03%
Copper, Cu	4300	1500	330	330	7.67%	22.00%
Lead, Pb	840	300	33	33	3.93%	11.00%
Mercury, Hg	57	17	3.3	3.3	5.79%	19.41%
Molybdenum , Mo	75	----	16		21.33%	
Nickel, Ni	420	420	70	70	16.67%	16.67%
Selenium, Se	100	36	33	33	33.00%	91.67%
Zinc, Zn	7500	2800	970	970	12.93%	34.64%

DATA MANAGEMENT

All files are kept in Mr. Perry's office at the WWTP. The paper filing system has one file for each SIU consisting of five sections (correspondences, sampling, inspections, permits and miscellaneous).

During the file review, I noticed that the files lack the following:

- a. Industry responses to City letters and vice versa.
- b. Semiannual reports.
- c. Enforcement documentation.
- d. Compliance reports.
- e. Compliance determination.
- f. Evaluation of the need for Slug control.

CONCLUSION AND RECOMENDATIONS

Overall, the City of Lebanon, Missouri Approved Pretreatment Program is poorly implemented. Current staff members do not have the basic knowledge to ensure adequate implementation of the program. The City continues to ignore observations and recommendations made by the EPA and the MDNR during previous audits and inspections, especially those issues that I observed and I pointed out to the City during my audit in June 2007 and which continue to exist.

Mr. Perry was given the responsibility of coordinating the City's approved program in 2011. However, the City never provided him with the opportunity to receive formal Pretreatment training. The City should give the Pretreatment Coordinator and other staff members responsible for the implementation of the Pretreatment Program the opportunity to attend Pretreatment training courses. The City should also cross-train other qualified staff members. City staff members need to locate and revisit and become more familiar with the Enforcement Response Plan (ERP) document, the Sewer Use Ordinance (SUO), and general Pretreatment Regulations. The City should be working closely with the Missouri Department of Natural Resources on

adopting the EPA Streamlining Rule.

The City should evaluate its local limits and make the determination if new local limits are needed.

The City should conduct an IWS to ensure that all industrial and commercial contributors are accounted for. A survey should be conducted at a minimum of once every permit cycle, and whenever the industrial base changes significantly. All IWSs should be documented and filed.

The City should make sure that all industries submit a complete and timely permit renewal application. The City should carefully review permit renewal applications prior to reissuing the permit document to ensure that the correct effluent limits are included in the permit (especially in the case of RBC).

Industrial permits are poorly written. The City should evaluate its industrial permits and should include all of the necessary elements needed in a good enforceable permit. Permits should also include the most stringent numerical limits in the permit (local, categorical, or calculated limits if the combined wastestream formula is applicable), and should include language making the industries accountable for sample collection when the City is unable to do so.

In order to verify compliance with applicable requirements, the City should conduct thorough inspections of its industries. Prior to inspections, City personnel should carefully review industry files, including permit applications, compliance and monitoring records, and the Categorical Standard. Inspections should consist of a facility walkthrough, record review, and an evaluation of the need for a spill prevention plan and/or slug control plan if applicable. In addition, the City should complete the industrial user inspection checklist during the interview with facility staff. The City should also review all Spill/Slug Control Plans and TOMP's submitted by industries when applicable.

The City should examine all monitoring results more thoroughly against permit limits and its local limits to assure compliance and to assess that proper sampling procedures are being used.

The City should ensure that cyanide should be a grab sample not a composite and that pH readings are taken within the 15-minute time limit after sample collection.

The City should ensure that all monitoring reports include a signed Compliance Certification statement and TTO Certification statement for those facilities that are allowed to develop and implement the Solvent Management Plan/Toxic Organic Management Plan (TOMP) in lieu of monitoring for TTOs.



Naji J. Ahmad

Environmental Engineer.

January 18, 2017.

ATTACHMENTS:

Audit Checklist, (17 pages)



Audit

Approved Pretreatment Program

Date(s): **December 12, 13 and 14, 2016**

FY 17

POTW: CITY OF LEBANON, MO Address: 1727 Main Street Lebanon, MO 65536	Date of last PCI/Audit: April 25, 2013 (MDNR)
	NPDES Permit No.: MO-0089010 State Permit No.: MO-0089010 Expiration Date: 01/03/2017
Contact: Craig Perry Title: Wastewater Chief Operator Phone: 417-588-6090 x1153 Fax: 417-588-6098	

Participants

POTW: Craig Perry, Wastewater Chief Operator Pretreatment Coordinator	Inspectors: Naji J. Ahmad, Environmental Engineer, EFCB/ENST
Period covered by this PCI/Audit: 2014, 2015 & 2016	

POTW Information

Total for ALL Treatment Plants (MGD)			
Design Daily Ave. 2.6	Actual Daily Ave. 2.4	Design Peak: 3.5	% Industrial Flow: 40
Number of Plants: 1	% Combined Sewers: NONE	Type of Treatment at Principal Plant: Oxidation Ditch	
Sludge Disposal Method: Land Application		Quantity (dry/tons/Y): 500	Receiving Stream: Dry Auglaize Creek

PART I: PROGRAM BACKGROUND INFORMATION

I.A. Approved Modifications to the Original Program
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1.

Date of last NPDES permit modification: 11/7/2012	Date of original Program approval: 12/19/1984	
	Date NPDES Permit originally modified to require implementation [PTIM]:	

2. Approved Pretreatment Program modifications:

REQUIRED MODIFICATIONS	APPROVAL DATE	OTHER APPROVED MODIFICATIONS	APPROVAL DATE
PIRT SUO Revisions	09/17/1992		
List of SIUs [403.8(f)(6)]	03/31/1991		
Enforcement Response Plan	01/22/1992		
DSS SUO Revisions	09/17/1992		
LOCAL LIMITS	1996		

3. Is the POTW presently working on any program modifications?

4. Does the POTW have any program modifications currently being reviewed by the Approval Authority?

I.B. Approved Program Contents

5. Authority to enforce Pretreatment Standards contained in:

Sewer User Ordinance: Article VI. Chapter 26

6. Date enacted or adopted: **September 17, 1992**

7. Approved Control Mechanism: **Permits**

Note: Italicized question numbers indicate that the question is data base supported.

8. What is the frequency required by the **approved program**/modifications for:

Activity	Non-categorical SIUs	Categorical SIUs*
POTW sampling of:	1	1
POTW inspection of:	1	1
SIU self-monitoring:	NA	2
SIU reporting:	NA	2

* For Categorical pollutants

9. What types of enforcement options are available through the approved program:

Y	Notice of Violation (NOV)
Y	Administrative Order (AO)
Y	Show Cause Hearing
Y	Establishment of Compliance Schedules
Y	Revocation of Permit
Y	Injunctive Relief
NO	Fines; Maximum \$1000/day/violation
Y	Criminal Penalties
Y	Termination of Service

10. COMMENTS: **The approved program limit fines to \$500.**

PART II: INTERVIEW QUESTIONS

II.A. Legal Authority and Jurisdiction

11. Have any Pretreatment modifications been made to the Sewer Use Ordinance since the last PCI/Audit that have not been approved by the Approval Authority. **NO**

12. List by name and location any SIUs that discharge to the POTW from outlying jurisdictions. **NO**

Indicate which of the above are not covered by a contract/agreement requiring them to abide by the POTW's legal authority. **NONE**

13. Does the POTW have the authority to seek fines up to \$1000 per day? [403.8(f)(1)(vi)]
NO. The approved program limit fines to \$500.

14. If the POTW has not yet developed an Enforcement Response Plan when does the POTW feel it will complete this requirement? **NA**

15. COMMENTS

The ERP was developed but was missing since 2007. City needs to redevelop new ERP.

II. B. Control Mechanism

16. General Information:

Type: PERMITS	Issued to Noncategorical SIUs? [DSS: 403.8(f)(2)(i)] YES
Duration: 5	ALL SIUs are CIUs

17. Do all SIUs have current (unexpired) control mechanisms? {NOCM} **YES**

18. List by name those that do not and indicate which ones have not had a current control mechanism for 180 days or more. {RNC/SNC}. **NONE**

II.C. Hauled Wastes

19. Does the POTW accept hauled waste? (If "no," go to question 25) **YES**

a. if so describe (include approx. no. of loads per month):
Usually Septic Waste. 5 1,000 gallon loads per week on average.

b. How does the POTW ensure that it does not accept hazardous waste?
THE CITY HAS NO MECHANISM TO ENSURE THAT.

20. Does the POTW have a control mechanism for regulating waste haulers, and if so describe. **NO**
21. Does the POTW have a designated discharge point (or points) for waste haulers? [DSS: 403.5(b)(8)]
Describe: **YES. Septic waste is to headworks, Oil and Grease into the sludge holding tanks.**
22. Are all applicable Categorical standards and Local Limits applied to IUs whose wastes are hauled to the POTW? **NO**
23. Describe the method used to apply local limits to hauled waste.
THE CITY HAS NO MECHANISM TO ENSURE THAT.
24. COMMENTS:

II.D. Industrial User Characterization

25. How often does the POTW update its Industrial Waste Survey (IWS) to identify new SIUs or changes to wastewater discharges? **NONE.**
- a. When was the last formal update: **1992**

26. What is the POTW's current industrial base?

Current	Industrial User Type	Last Reported
4	Categorical SIUs {CIUS}	4
	Non-Categorical SIUs	
4	Total all SIUs {SIUS}	4

II.E. Local Limits

27. Does the POTW have numerical limits for metals in its NPDES permit? If so list the metals and the limits (or attach list). **Copper and Zinc.**
28. Have there been any numerical NPDES permit violations in the last 12 months?
Yes, the monthly average for copper in October 2016.
- a. Were any of the numerical NPDES violations, identified above, a result of interference or pass through? **THE CITY HAS NO MECHANISM TO ENSURE THAT.**

1. Was the interference traceable to an industrial user? **UNKNOWN**
2. Was action taken that led to elimination within 90 days of the interference or pass through? **{SNC} UNKNOWN**
3. Was the responsible industry placed on an enforceable compliance schedule within 90 days of discovery? **{SNC} If not, why? UNKNOWN**

29. How many times per year does the POTW regularly sample its PRINCIPAL plant for the following?

Parameter	Influent	Effluent	Sludge
Metals	2/YEAR	12/YEAR	4/ YEAR
Toxic Organics	0	0	1/YEAR
Biomonitoring		2/YEAR	
TCLP			1/YEAR

30. List below the numerical value for the local limits derived by technical analysis. If a technical analysis was performed but the limit not adopted enter DNA in the block. (Values assumed to be mg/l unless otherwise noted). **{EVLL} {ADLL}**

POLLUTANT	DAILY MAX	POLLUTANT	DAILY MAX
ARSENIC	NA	LEAD	NA
CADMIUM	NA	MERCURY	NA
CHROMIUM	NA	NICKEL	NA
COPPER	NA	SILVER	NA
CYANIDE	NA	ZINC	NA

Comments: **City developed local limits in 1996 but never adopted them. SUO still reflects the 1984 limits**

31. Are the POTW's BOD and TSS limits technically derived (ie. based on plant capacity)? **YES**
32. Are BOD and TSS violations treated as violations of technically based local limits? **NO**
33. If there is more than one treatment plant, were the local limits established specifically for each plant? **NA**
34. Has the POTW made any changes to its Local Limits which have not been approved, and if so provide details? [403.18] **NO.**
35. Has the POTW granted any Net/Gross allowances under 403.15? **NA**

36. COMMENTS:

II.F. Standards and Requirements for Industrial Users

37. Does the POTW compare local limits against federal Categorical standards and apply the most stringent standards to Categorical IUs? [403.4]
Appears YES, because permits have the most stringent limits.
38. Has the POTW notified its IUs of possible RCRA obligations? [40 CFR 403.8(f)(2)] **NONE.**
39. Does the POTW allow Categorical users to use Solvent Management Plans/certification or surrogate test procedures to meet TTO requirements? **YES. But industries failed to submit the TOMP and failed to submit the certification statement since 2013. Industries submitted the certification annually rather than semiannually.**

II.G. POTW Compliance Monitoring and Inspections

40. What is the current frequency for:

Activity	Non-categorical SIUs	Categorical SIUs*
POTW sampling of:	NA	3+ / year
POTW inspection of:	NA	1/ Year
SIU self-monitoring:	NA	NA
SIU reporting:	NA	2/ year

* For Categorical pollutants

41. List exceptions:
42. List those SIUs that were not sampled by the POTW within the last 12 months. [DSS: 403.8(f)(2)(v)]
Detroit Engineering. Industry claims no discharge.
43. List those SIUs that were not inspected within the last 12 months. [DSS: 403.8(f)(2)(v)] **NO.**
44. How many industries were neither sampled nor inspected within the last 12 months. [DSS: 403.8(f)(2)(v)]
{NOIN}{RNC/SNC} NO.
45. Does the POTW sample its SIUs for all regulated pollutants at least once annually? [403.8(f)(2)(v)]
NO. They missed Nickel.

46. Sample/Analysis Procedures:

Chain-of-Custody always used? YES	Sampling method, metals: Time Composite
Ability to sample on short notice? YES	Sampling method, CN: Composite
In-house analysis of toxic pollutants: NO	Sampling method, O&G: Grab
Do in-house analytical methods conform to 40 CFR part 136? NO because CN.	

47. How does the POTW document its industrial user inspections?

Using a six-page checklist. However only the first page is completed

48. Does the POTW evaluate all SIUs at least every two years to determine the need for a slug discharge/spill control plan? [DSS: 403.8(f)(2)(v)] **NO.**

a. Describe the method used by the POTW to evaluate the need for a slug control plan.

THE CITY HAS NO MECHANISM TO ENSURE THAT.

II.H. IU Self Monitoring and Reporting

49. Are all Categorical IUs required to self-monitor for all pollutants regulated by the respective Categorical standard at least twice per year? [403.12(e)] **NO, City does all monitoring**

50. Were any Baseline Monitoring Reports or 90 day Compliance Reports due within the past 12 months?. If so, from whom? Were the reports submitted? **NO**

51. Are IUs required to report spills, slug discharges, etc. to the POTW? [403.12(f)] **YES**

52. Are IUs required to report violations within 24 hours of knowledge of the violation? [403.12(g)(2)] **YES**

53. Are IUs required to resample and submit results within 30 days following a violation as per 403.12(g)(2)? **YES**

II.I. Data Management

54. Are files/records computerized? **YES**

55. Are all records maintained for at least 3 years? [403.12(o)] **YES**

56. Are program records available to the public as required by 40 CFR 403.14(b)? **YES**

57. Does the POTW have provisions to address confidential business information? [403.14(a)] **YES**

58. How is compliance status calculated? Describe the procedure used in determining Significant Noncompliance (eg. are mo. avg. violations considered as well as daily max?).

II.J. Program Resources

59. What percent of the Pretreatment Coordinator's time is spent on pretreatment?

15 percent.

60. What computer programs does the POTW use for:

Wordprocessing:	WORD
Spreadsheet:	EXCEL
Database:	EXCEL

61. Does the POTW believe its annual budget adequate for implementation? **YES**

- a. If not, is the level of money available for pretreatment less than that in the approved program or approved modification?

II.K. Special Questions

62. Are there any issues that the POTW would like to discuss?

General Pretreatment requirement.

Stream lining Rules need to be adopted by the City.

Sewer Use Ordinance requirement.

Industrial waste survey.

Local limits concept.

Hauled Waste.

SNC calculations and definition.

Enforcement Response Plan.

Inspections.

Pretreatment Coordinator Training.

PART III: FILE AND RECORDS REVIEW

Following is a table containing the POTW's Significant Industrial User inventory regulated by its Pretreatment Program. Please verify that all information in the table is correct and current. For those industries no longer regulated draw a line through the entry. Add all new industries and provide the information sought by the table. Below is a guide to the information sought by the table and suggested abbreviations.

INDUSTRY:

Provide the name of each industrial user regulated under the pretreatment program.

CAT STND:

Provide the categorical standard code number. For example, industries subject to the Metal Finishing regulation should be designated "433." For noncategorical industries indicate "NA" in this column.

REG PROCESS:

Indicate what process the industry performs to qualify for inclusion in the pretreatment program. For example, if an industry is subject to Metal Finishing regulations because it performs zinc and chromium plating indicate with "ZnCrPL" or a similar abbreviation.

TMT:

If the facility treats its wastestream(s) indicate "Y." If no treatment is provided indicate "N."

TYPE:

Indicate the type of pretreatment system (if applicable) the industry has. Suggested abbreviations: "precip" for precipitation/clarification; "precip/flt" for precipitation followed by filtration; "DAF" for dissolved air flotation; etc.

REG FLOW:

Provide the industry's average daily flow for its regulated processes in gallons per day. The abbreviation "K" stands for 1000.

TOT FLOW:

Provide the average daily total plant flow in gallons per day.

CWF:

Indicate if the industry uses the Combined Wastestream Formula to determine compliance with categorical standards. "Y" = yes, "N" = no.

COMPLIANCE STATUS FOR THE 6 MO PERIOD ENDING:

For the six month periods listed, indicate if the industry's compliance status. Use the following abbreviations:

CIn compliance with all standards: no violations.

IInfrequent noncompliance with discharge standards: the facility had some violations but not severe enough to be considered in significant noncompliance.

SNC,SIn significant noncompliance with discharge standards.

SNC,RIn significant noncompliance with reporting requirements: the industry failed by greater than 30 days to submit reports as required.

SNC,MIn significant noncompliance with self monitoring requirements: the industry did not properly report its compliance status on its self monitoring report.

SNC,C Failure to meet a compliance schedule milestone by 90 days.

LAST INSPECTION:

Date of the last inspection performed by th

SECTION VII: SIGNIFICANT INDUSTRIAL USERS

Industry Name	Cat. Std.	Reg. Process	T M T	Type	Daily Reg. Flow	Daily Total Flow	C W F	Compliance Status for Six Month Period Ending:				Last Inspection
								DEC' 2013	JUN' 2014	DEC' 2014	JUN 2016	
Copeland Corporation	433	Fe PHOS	N		140K	1.03M	N	SNC-S* SNC-R**	SNC-S* SNC-R**	SNC-S* SNC-R**	SNC-S* SNC-R**	9-6-2016
Detroit Tool & Engineering	433	Fe PHOS	N		30K	255K	N	SNC-S* SNC-R**	SNC-S* SNC-R**	SNC-S* SNC-R**	SNC-S* SNC-R**	10-5-2016
Detroit Metal Products	433	Fe PHOS	N		500K	12M	N	SNC-S* SNC-R**	SNC-S* SNC-R**	SNC-S* SNC-R**	SNC-S* SNC-R**	10-15-2016
RBC Mnfg. (Marathon Electric)	433, 464	Fe PHOS	N		37.5K	4.6M	N	SNC-S* SNC-R**	SNC-S* SNC-R**	SNC-S* SNC-R**	SNC-S* SNC-R**	9-2-2016

* All CIUs failed to sample for nickel.

** All CIUs failed to submit semiannual TTO certification statements.

III.B. Significant Industrial User Compliance Evaluation

63. From the above list of industries, how many are in Significant Noncompliance (SNC) with either discharge standards or reporting requirements based on the most recent six-month reporting period?
{PSNC} ALL

64. List by name, those industries currently on a compliance schedule. Complete the table below.

Industry Name	Date Schedule Issued	Compliance Deadline	How Administered*
Copeland Corporation	NONE	NONE	NONE
Detroit Tool & Engineering	NONE	NONE	NONE
Detroit Metal Products	NONE	NONE	NONE
RBC Mnfg. (Marathon Electric)	NONE	NONE	NONE

eg. Administrative Order, Permit, etc.

65. List those industries last published in the newspaper for noncompliance and provide the date (or attach a copy of the public notice). **NONE**

66. If an industry has been deleted from the list of Significant Industrial Users list by name below and provide the reason. **NONE.**

67. For those industries in SNC within the last 12 months complete the following table for all written enforcement actions.

IU Name	Violation	Date of POTW knowledge	Date of Action	Enforcement Action	ERP required action

68. Provide the total number of NOV's, Administrative actions, Judicial referrals, and criminal prosecutions that occurred in the last twelve months. **{FENF} {JUDI} NONE.**

69. Were all actions taken by the POTW within 30 days of knowledge of a violation? **{RNC/SNC} NO.**

70. Did all industries in SNC either return to compliance within 90 days, receive escalated enforcement action by the POTW within 90 days, or become placed on an enforceable compliance schedule within 90 days (of knowledge by the POTW) of the violation? **{RNC/SNC} NO.**

III.C. Control Mechanism Evaluation

71. Do the POTWs control mechanisms:

Permittee: **RBC Mnfg**

REQUIRED [DSS: 403.8(f)(1)(iii)]		SUGGESTED PROVISIONS	
Specify duration (no > 5 yrs.):	YES	Cite the POTW's legal authority:	YES
Contain the correct discharge limits:	NO	Identify TTO alternatives, if applicable:	YES
Specify sample type for IU self monitoring:	NA	Require notification within 24 hrs of a violation:	YES
Adequately identify sampling location:	YES	Require resample/report in 30 days of violation:	NO
Specify sampling frequency:	YES	Specify right of entry:	NO
State applicability of civil or criminal penalties:	NO	Reserve right to revoke permit:	YES
Stipulate reporting frequency:	YES	Specify immediate . slug load notification:	NO
Properly require records retention:	YES	Require submission of all sampling results:	YES
Specify limited transferability:	NO		

Result of this review from the last PCI/audit:

III.D. Industrial Inspection Evaluation

72. Do the Industrial Inspection reports contain?

SIUs: **RBC Mnfg**

Name of Company contact:	YES	Evaluation of IU's monitoring procedures:	NA
Date of inspection:	YES	Verification of wastewater flow rates:	NO
Time of inspection:	YES	Determination of applicability of the CWF:	NO
Description of manufacturing process:	YES	Description of the chemical storage area:	NO
Description of treatment process, if any:	NO	Identification of potential spill conditions:	NO
Evaluation of IU's monitoring methods:	NA	Verification of production rates that would affect production based standard:	NO

III.E. Slug Discharge Control Procedures

73. If the POTW has required the submittal of a Slug Control Plan does it contain: [DSS: 403.8(f)(2)(v)]

- _____ A description of discharge practices including non-routine batch discharges
- _____ A description of stored chemicals
- _____ Procedures for immediate notification of slug discharges with written follow-up notification
- _____ Procedures necessary to prevent adverse effects at the POTW's treatment plant:
 - _____ inspection and maintenance of storage areas
 - _____ handling and transfer of materials
 - _____ loading and unloading operations
 - _____ control of plant site runoff
 - _____ worker training
 - _____ building of containment structures
 - _____ measures for the control of toxic organics
 - _____ measures for emergency response

74. COMMENTS

III.F. Industrial User File Review Checklists
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Following are worksheets to aid in the assessment of the nature of the oversight activities and compliance status of the POTW's Significant Industrial Users. When reviewing SIU files priority should be placed on Categorical industries that either have a history of violations or that appear to be in compliance but have not installed that prescribed BAT technology to consistently meet discharge limits. While only three pages are provided the reviewer is encouraged to copy and add additional review pages for larger POTWs.

Yes Note the production based limits need site visit
464 Metal Molding & Casting

Industry Name: RBC Mnfg (Marathon Electric) *might not*
Principal Pollutants: Iron, Phosphate No. of Employees:
Products:

- A. Does the file system for the industrial user contain:
- Permit application *need signature*
 - Current Permit
 - Correct limits in Permit
 - Correspondence/meeting notes/phone log
 - Most recent inspection report
 - Evaluation for need for Slug control
 - Compliance status determination
 - POTW sampling results
 - Self-monitoring reports
 - Enforcement documentation
 - Solvent Management Plan
 - Correct application of the CWF
 - Slug Control Plan

note oil & grease in lieu of TSD for 464?

- B. Did the industry discharge any slug loads or spills to the POTW in the past 12 months? [403.12(f)]
- U/A*
- Immediate notification by the IU
 - POTW response
 - Follow-up written notification
 - Effect on the plant

collected grab samples but permit requires 24 hr. comp. including CM*

- C. In the last complete calendar year how many times did the POTW:
- Sample the IU 3 Inspect the IU 1

- D. Were all regulated pollutants analyzed by the POTW at least once in the most recent calendar year? *Yes*

- E. If the industry is subject to Categorical Standards did its self-monitoring reports contain analysis for all regulated pollutants at least once during every six month period during the last full calendar year? *Yes -> City did*

- F. Frequency in the IU's control mechanism for: Self-monitoring 0 Reporting 1 *sampling collections*

- G. Did the industry comply with the sampling and reporting frequency requirements of its Control Mechanism? *did not report since 2013*

- H. Did the POTW identify all IU violations from: *no not reporting*

- IU Self-monitoring _____ POTW Compliance monitoring

- I. Was the IU's compliance status (i.e. SNC, Infrequent noncompliance, Consistent compliance) determined properly? *focused on the sampling results only*

J. Complete the following table for all violations in the last 12 months. (If this information has already been provided in Question 85, please indicate).

Violation	Date of Violation	Date of POTW Knowledge	Date of POTW Response	ERP Required Response	POTW Response
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did not document any violations

one page inspection report

Industry Name: **Detroit Tool & Engineering**
Principal Pollutants: **Iron, Phosphate**
Products: **METAL STAMPINGS,**

No. of Employees:

A. Does the file system for the industrial user contain:

- NO* Permit application POTW sampling results
 Current Permit Self-monitoring reports
 Correct limits in Permit Enforcement documentation
(None) Correspondence/meeting notes/phone log Solvent Management Plan
 (1) Most recent inspection report Correct application of the CWF
 Evaluation for need for Slug control Slug Control Plan
 Compliance status determination

B. Did the industry discharge any slug loads or spills to the POTW in the past 12 months?
[403.12(f)]

- Immediate notification by the IU Follow-up written notification
 POTW response Effect on the plant

C. In the last complete calendar year how many times did the POTW:

Sample the IU _____ Inspect the IU _____

D. Were all regulated pollutants analyzed by the POTW at least once in the most recent calendar year?

E. If the industry is subject to Categorical Standards did its self-monitoring reports contain analysis for all regulated pollutants at least once during every six month period during the last full calendar year?

F. Frequency in the IU's control mechanism for: Self-monitoring _____ Reporting _____

G. Did the industry comply with the sampling and reporting frequency requirements of its Control Mechanism?

H. Did the POTW identify all IU violations from:

IU Self-monitoring _____ POTW Compliance monitoring _____

I. Was the IU's compliance status (i.e. SNC, Infrequent noncompliance, Consistent compliance) determined properly?

J. Complete the following table for all violations in the last 12 months. (If this information has already been provided in Question 85, please indicate).

<u>Violation</u>	<u>Date of Violation</u>	<u>Date of POTW Knowledge</u>	<u>Date of POTW Response</u>	<u>ERP Required Response</u>	<u>POTW Response</u>
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(1) inspection reports are not complete one page of six

(2) NO TOMP plan

(3) last application is 2003

Industry Name: **Detroit Metal Products**
 Principal Pollutants: **Iron, Phosphate**
 Products: **Manufacturing Metal Stamping Machines**

No. of Employees: 300

A. Does the file system for the industrial user contain:

- 11/30/2012 Permit application
 - 2/25/13 - 2/28/18 Current Permit
 - 2013 OK Correct limits in Permit *extra*
 - 0 Correspondence/meeting notes/phone log
 - 2016 Most recent inspection report
 - N Evaluation for need for Slug control
 - N Compliance status determination
 - 8-01-16 POTW sampling results
 - Some Self-monitoring reports
 - None found Enforcement documentation
 - N Solvent Management Plan
 - N/A Correct application of the CWF
 - N Slug Control Plan
- Handwritten notes:* Total Toxic Orginits Mgt Plan
 → Evaluate the need
 TOT NOT in file for 2014, 2015, 2016

B. Did the industry discharge any slug loads or spills to the POTW in the past 12 months?
 [403.12(0)]

- NO Immediate notification by the IU
- NO POTW response
- NO Follow-up written notification
- NO Effect on the plant

C. In the last complete calendar year how many times did the POTW:

Sample the IU 2 Inspect the IU 1

D. Were all regulated pollutants analyzed by the POTW at least once in the most recent calendar year?

Handwritten: No Nickel was not sampled in 2016

E. If the industry is subject to Categorical Standards did its self-monitoring reports contain analysis for all regulated pollutants at least once during every six month period during the last full calendar year?

Yes

2013 F. Frequency in the IU's control mechanism for: Self-monitoring 3/yr Reporting 2 X June + Dec

G. Did the industry comply with the sampling and reporting frequency requirements of its Control Mechanism?

H. Did the POTW identify all IU violations from:

IU Self-monitoring Not reported → Not since 2013
 POTW Compliance monitoring No

Handwritten: last report from CI was 2013.

I. Was the IU's compliance status (i.e. SNC, Infrequent noncompliance, Consistent compliance) determined properly?

No reports.

NO

J. Complete the following table for all violations in the last 12 months. (If this information has already been provided in Question 85, please indicate).

Violation	Date of Violation	Date of POTW Knowledge	Date of POTW Response	ERP Required Response	POTW Response
<u>N/A</u>					

Permit has surcharge for BOD/TSS that is not in permit.
 500.

Signature: Jack Lane

12/13/16

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